

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Criminal No. 25-mj-3059 (KAR)

JACOB D. MILLER

**GOVERNMENT'S MOTION FOR PRETRIAL DETENTION
OF DEFENDANT PURSUANT TO 18 U.S.C. §§ 3142(e) and (f)**

The United States of America, by its undersigned attorneys (the “Government”) moves for pretrial detention of defendant, pursuant to 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because it involves (check all the apply):

_____ Crime of violence (18 U.S.C. §§ 3142(f)(1)(A) and 3156)

_____ Maximum sentence life imprisonment or death (18 U.S.C. § 3142(f)(1)(B))

_____ 10 plus years drug offense (18 U.S.C. § 3142(f)(1)(C))

_____ Felony, with two prior convictions in above categories (18 U.S.C. § 3142(f)(1)(D))

XXX Felony involving possession of firearm / destructive device (18 U.S.C. § 3142(f)(1)(E))

_____ Serious risk defendant will flee (18 U.S.C. § 3142(f)(2)(A))

XXX Serious risk of obstruction of justice

2. Reason for Detention. The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

_____ Defendant's appearance as required

XXX Safety of any other person and the community

3. Rebuttable Presumption. None.

4. Time for Detention Hearing. The Government requests that the court conduct the detention hearing in three days.

5. Witnesses.

The Government intends to proceed by proffer with the evidence set forth in the Affidavit of FBI Special Agent Dustin Farivar in support of the defendant's Criminal Complaint and in the Affidavit of FBI Special Agent Derek Boucher in support of the instant motion for pretrial detention.

6. Other Matters.

None.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney
STEVEN
BRESLOW

Digitally signed by STEVEN BRESLOW
Date: 2025.04.10 15:46:54 -0400

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Dated: April 10, 2025

Certificate of Service

I hereby certify that this document was filed by ECF and will be sent to the registered participants as identified on the Notice of Electronic Filing.

By: /s/ Steven H. Breslow
STEVEN H. BRESLOW
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